

May 4, 2018

**VIA ECF**

Honorable Chief Magistrate Judge Roanne L. Mann  
U.S. District Court, Eastern District of New York

**Re: 1:17-cv-02162-AMD-RLM Bonikos et al v. Foodoni NY 23 Corp. et al**

Dear Honorable Judge,

This office represents Plaintiffs in the above-referenced matter. We write with the consent of Plaintiff's counsel to request an extension of the deadline to file a joint pre-trial order for both parties.

First and foremost, the parties would like to apologize for their insistence on extending the deadline to file pre-motion conference letters. Both parties misunderstood the deadline for such submission to be the deadline to file pre-motion conference requests on discovery disputes. Neither party understood this deadline to be solely for the filing of dispositive motions. For this reason, we would like to apologize to the Court.

As to the request for the adjournment of the joint pre-trial order, I am getting married on Tuesday and, as per religious obligations, I cannot leave the side of my new bride for one week subsequent to our wedding. It is a Syrian Jewish tradition that I cannot get out of. I'm sure it has some traditional roots that I am just unaware of. I have attempted to locate substitute counsel from my office, but unfortunately, both partners lack the knowledge about the case in order to prepare a satisfactory joint pretrial order. A brief 21-day extension of both parties' deadline would be ideal in allowing me the time off and making certain that I am not rushing the filing of the pretrial order prematurely. The parties can also use this time to continue their negotiations in the matter.

Accordingly, the parties respectfully request a 21-day extension of the deadline to file a joint pre-trial order for both parties.

Thank you for your time and consideration.

Very Truly Yours,

/s/

Salim Katach, Esq.

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